

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

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UNITED STATES OF AMERICA : : SEALED INDICTMENT

- v. - : : 15 Cr.

CORY HARRIS,
a/k/a "Hop,"
a/k/a "P,"
DANIEL HERRING,
a/k/a "Mike,"
FRANK JENKINS JR.,
a/k/a "Frizz,"
JARON LANGHORNE,
a/k/a "Ghost,"
MITCHELL MALDONADO,
RAHEEM MALDONADO,
UNIQUE NEWELL,
a/k/a "Trilla,"
ADAM PHILLIPS,
KRISTAL PINSONNEAULT,
ANDREW ROBLES,
a/k/a "AJ,"
MIGUEL ROBLES, and
LUIS ZABALA,
a/k/a "Ant,"

Defendants. : :
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: : **15 CRIM 386**

USDC SDNY
DOCUMENT
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COUNT ONE

The Grand Jury charges:

1. From at least in or about 2014, up to and including in
or about 2015, in the Southern District of New York and
elsewhere, CORY HARRIS, a/k/a "Hop," a/k/a "P," DANIEL HERRING,
a/k/a "Mike," FRANK JENKINS JR., a/k/a "Frizz," JARON LANGHORNE,
a/k/a "Ghost," MITCHELL MALDONADO, RAHEEM MALDONADO, UNIQUE

JUDGE KOELT

NEWELL, a/k/a "Trilla," ADAM PHILLIPS, KRYSTAL PINSONNEAULT, ANDREW ROBLES, a/k/a "AJ," MIGUEL ROBLES, and LUIS ZABALA, a/k/a "Ant," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that CORY HARRIS, a/k/a "Hop," a/k/a "P," DANIEL HERRING, a/k/a "Mike," FRANK JENKINS JR., a/k/a "Frizz," JARON LANGHORNE, a/k/a "Ghost," MITCHELL MALDONADO, RAHEEM MALDONADO, UNIQUE NEWELL, a/k/a "Trilla," ADAM PHILLIPS, KRYSTAL PINSONNEAULT, ANDREW ROBLES, a/k/a "AJ," MIGUEL ROBLES, and LUIS ZABALA, a/k/a "Ant," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that DANIEL HERRING, a/k/a "Mike," FRANK JENKINS JR., a/k/a "Frizz," JARON LANGHORNE, a/k/a "Ghost," MITCHELL MALDONADO, UNIQUE NEWELL, a/k/a "Trilla," ANDREW ROBLES, a/k/a "AJ," and LUIS ZABALA, a/k/a "Ant," the defendants, conspired to distribute and possess with intent to distribute were: (1) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United

States Code, Section 841(b)(1)(A); and (2) 100 grams and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(B).

4. The controlled substance that CORY HARRIS, a/k/a "Hop," a/k/a "P," RAHEEM MALDONADO, and MIGUEL ROBLES, the defendants, conspired to distribute and possess with intent to distribute was 100 grams and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(B).

5. The controlled substance that ADAM PHILLIPS, the defendant, conspired to distribute and possess with intent to distribute was 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(A).

6. The controlled substances that KRYSTAL PINSONNEAULT, the defendant, conspired to distribute and possess with intent to distribute were: (1) mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(C); and (2) mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(C).

Means and Methods of the Conspiracy

7. During the period charged in the Indictment, members of the conspiracy obtained crack and heroin in the Southern District of New York and elsewhere. Members of the conspiracy then transported the crack and heroin to Vermont, for distribution in and around Bennington, Vermont.

8. During the period charged in the Indictment, members of the conspiracy sold crack and heroin from particular locations in Bennington. These locations included an apartment on Gage Street, apartments on Pleasant Street, and rooms in certain motels in Bennington.

9. During the period charged in the Indictment, members of the conspiracy provided heroin, crack, and other controlled substances to certain women in and around Bennington, who were addicted, or became addicted, to those controlled substances. These women assisted members of the conspiracy with the transport, storage, and distribution of crack and heroin in exchange for additional controlled substances, or in exchange for cash that the women used, in part, to purchase additional controlled substances.

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury further charges:

10. From at least in or about 2014, up to and including in or about 2015, in the Southern District of New York and elsewhere, CORY HARRIS, a/k/a "Hop," a/k/a "P," FRANK JENKINS JR., a/k/a "Frizz," JARON LANGHORNE, a/k/a "Ghost," MITCHELL MALDONADO, UNIQUE NEWELL, a/k/a "Trilla," ANDREW ROBLES, a/k/a "AJ," and LUIS ZABALA, a/k/a "Ant," the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

COUNT THREE

The Grand Jury further charges:

11. In or about April 2012, in the Southern District of New York and elsewhere, CORY HARRIS, the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, distribution and possession with intent to distribute mixtures and substances containing a detectable amount of marijuana, knowingly did use and carry firearms, and, in furtherance of such crime, did

possess firearms, and did aid and abet the use, carrying, and possession of firearms.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and (c)(1)(C)(i), and 2.)

FORFEITURE ALLEGATION

12. As a result of committing the controlled substance offense alleged in Count One of this Indictment, CORY HARRIS, a/k/a "Hop," a/k/a "P," DANIEL HERRING, a/k/a "Mike," FRANK JENKINS JR., a/k/a "Frizz," JARON LANGHORNE, a/k/a "Ghost," MITCHELL MALDONADO, RAHEEM MALDONADO, UNIQUE NEWELL, a/k/a "Trilla," ADAM PHILLIPS, KRYSTAL PINSONNEAULT, ANDREW ROBLES, a/k/a "AJ," MIGUEL ROBLES, and LUIS ZABALA, a/k/a "Ant," the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds said defendants obtained directly or indirectly as a result of the violation and any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of the violation alleged in Count One of this Indictment, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offense.

13. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be subdivided without difficulty;
- it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841 and 853.)



FOREPERSON



PREET BHARARA 
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

CORY HARRIS, et al.,

Defendants.

SEALED INDICTMENT

15 Cr.

(18 U.S.C. §§ 924(c) and 2,
21 U.S.C. § 846.)

PREET BHARARA
United States Attorney.

A TRUE BILL



Foreperson.

6/18/15 - Filed Sealed Indictment
AC
H/W issued.



Judge Goronsky
USM